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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF ANDREA PALLIOS
ROBERTS IN SUPPORT OF PLAINTIFF
WAYMO'S RESPONSE TO COURT
INQUIRY RE ANY USE BY WAYMO OF
EPHEMERAL COMMUNICATIONS AND
NON-ATTRIBUTABLE DEVICES**

1 I, Andrea Pallios Roberts, hereby declare as follows.

2 1. I am a member of the bar of the State of California and an attorney at Quinn
3 Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC (“Waymo”). I make this
4 declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and
5 would testify competently as follows.

6 2. Attached as Exhibit 1 is a true and correct copy of a November 30, 2017 article
7 from Recode entitled “Uber’s new chief legal officer tells staff: If you are surveilling people for
8 competitive intelligence, stop it now.”

9 3. Attached as Exhibit 2 is a true and correct copy of a December 1, 2017 article from
10 Reuters entitled “Three Uber security managers resign after CEO criticizes practices.”

11 4. Attached as Exhibit 3 is a true and correct copy of Google’s Account Security
12 Policy.

13 5. Attached as Exhibit 4 is a true and correct copy of Google’s Corporate Services
14 Security Policy.

15 6. Attached as Exhibit 5 is a true and correct copy of Google’s Mobile Device
16 Security Guidelines.

17 7. Attached as Exhibit 6 is a true and correct copy of Google’s security guidelines
18 regarding use of personal machines.

19 8. Attached as Exhibit 7 is a true and correct copy of excerpts from the Waymo
20 Employee Handbook, Guidelines and Policies.

21 9. Attached as Exhibit 8 is a true and correct copy of excerpts from the June 22, 2017
22 deposition of N. Qi.

23 10. Attached as Exhibit 9 is a true and correct copy of excerpts from the May 30, 2017
24 deposition of M. Feldman.

25 11. Attached as Exhibit 10 is a true and correct copy of excerpts from the June 16,
26 2017 deposition of J. Bares.

27 12. Attached as Exhibit 11 is a true and correct copy of Google’s Third Party Chat
28 Services Security Guidelines.

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

3
4 DATED: December 4, 2017

/s/ Andrea Pallios Roberts

Andrea Pallios Roberts

5
6 **SIGNATURE ATTESTATION**

7 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
8 filing of this document has been obtained from Andrea Pallios Roberts.

9
10
11 /s/ Charles K. Verhoeven

Charles K. Verhoeven